REMARKS

A. Status of the Claims

Claims 1-19 are pending in this application. These claims have been rejected under 35 U.S.C. § 103(a) for allegedly being unpatentable over U.S. Published Application No. 2002/067412 to Kawai ("Kawai") in view of U.S. Patent No. 5,528,289 to Cortjens et al. ("Cortjens").

B. The Combination of Cited References Does Not Arrive at Applicants' Claimed Invention.

Applicants respectfully traverse the rejection of claims 1-19 under 35 U.S.C. § 103(a) for allegedly being unpatentable over Kawai in view of Cortjens. Briefly, these references, alone or in combination, do not teach, disclose, or suggest all of the elements of Applicants' claimed invention [MPEP §2143.03]. Accordingly, the rejection of these claims should be withdrawn.

1. The Proposed Combination of References Does Not Teach,

<u>Disclose or Suggest All of the Elements of Applicants' Invention</u>

The independent claims of this application (*viz.* claims 1, 7, 13, and 19) recite, *inter alia*, the designation on the displayed map information of "an <u>arbitrary size</u>, <u>shape</u>, <u>and position of</u> an image sensing area to be sensed, <u>independent of the current image sensing area</u>" (emphases added).

The Office Action admits that "Kawai does not teach that the image sensing area can be of an arbitrary size, shape, and position and that the image sensing area to be sensed is

independent of the current image sensing area" [Office Action, page 3, ¶2]. For these claim elements, the Office Action relies on Cortjens.

According to the Office Action,

Cortjens et al teaches on Column 17, Lines 10-43 and in Figure 6A that it is advantageous when designing a camera system that is controlled be [sic by] a computer to enable the system so that a user can select a region in a larger image to be displayed simply by clicking the mouse button and dragging the mouse until the designated region is selected. The camera will then change its tilt and panning angles along with its zoom magnifications to match the selected region. This region is viewed by the examiner to be of an arbitrary size, shape, and position and that the image sensing area to be sensed is independent of the current sensing area.

Applicants, however, respectfully disagree with the Examiner's characterization of Cortjens at column 17, lines 10-43. This section of Cortjens states, in fact, that

FIG. 6A is an illustration of a monitor 21 having a screen 125, which is displaying a person 126 sitting at the end of a table 127. Assume now that the user wishes to focus on the person 126. Using a conventional system the user could adjust the pan and tilt controls and then adjust the zoom and focus controls so as to zoom in on person 126. However, using the present invention the user will simply use the 12 to place the pointer at the desired pointer starting point (PSP). Depress and hold a predetermined mouse button, such as the left button 12A, and drag the pointer across the area of interest, which causes a rectangular box to bein spreading across the screen, with one corner at the PSP. When the user reaches the desired ending point, the pointer ending point (PEP), the user will release the mouse button.. The user has thereby drawn a rectangle around the area of interest and release the mouse button. Controller 10 will then determine the appropriate pan and tilt for a camera and cause the camera to center its field of view to zoom in so that rectangle 128 fills, as fully as possible, screen 125, and also causes the camera to refocus, if necessary. The resultant display is seen in FIG 6B, which illustrates that the camera has been repositioned so that CR is now in the middle of the display (MD). Therefore, by the simple tasks of positioning the pointer in one corner of the desired scene, depressing a mouse button, dragging the mouse to draw a rectangle, and releasing the mouse button, the user has cause the selected picture to fill the display 125. The use of point, click, drag, and release techniques to draw a box, such as

box 128 are, in general, well known in the personal computer field. [Cortjens, col. 17, lines 10-43] (emphases added).

At best, it appears that this passage of Cortjens is merely directed to a simplified way of selecting and zooming in on a certain region of a <u>image that is already displayed on a monitor</u>. Accordingly, it does not teach, disclose, or suggest that the image sensing area to be sensed is "independent of the current image sensing area" as recited in Applicants' independent claims.

Moreover, this passage of Cortjens also does not teach, disclose, or suggest designation on a displayed map information of "an arbitrary size, shape, and position of an image sensing area to be sensed" as recited in Applicants claims. This section of Cortjens is <u>limited to a way to zoom in</u> on an image, and does not teach, expressly or otherwise, how to designate "an <u>arbitrary</u> size...of an image sensing area to be sensed," which would at least include zooming <u>out</u>, for example, as shown in Applicants' Figure 7C.

This passage of Cortjens also does not teach, expressly or otherwise, how to designate on the displayed map information of an "arbitrary...shape of an image sensing area to be sensed" as recited in Applicants' claims and as shown in Applicants' Figure 6. Cortjens is, in fact, limited to designating a rectangular area [see, e.g., Cortjens, col. 17, lines 39-43].

Additionally, this passage of Cortjens does not teach, expressly or otherwise, the designation on the displayed map information, of an "arbitrary...position of an image area to be sensed" as recited in Applicants' claims. As noted above, Cortjens only suggests a way to zoom in on a section of an image that is already on display on a monitor. It does not teach, disclose or suggest a way to designate a image area that is not in the original image that is already on display, as recited in Applicants' claim and as shown in Applicants' Figure 7A.

Applicants, upon review of the rest of Cortjens, do not believe that any other passage of Cortjens teaches, discloses, or suggests the designation on the displayed map information of an "arbitrary size, shape, and position of an image sensing area to be sensed, independent of the current image sensing area," as recited in Applicants' independent claims. Accordingly, Applicants maintain that the combination of Kawai and Cortjens does not teach or suggest all of the claim limitations of Applicants' independent claims 1, 7, 13, and 19. For at least this reason, the rejection of these claims under 35 U.S.C. §103(a) should be withdrawn.

For at least similar reasons, dependent claims 2-6, 8-12, and 14-18 are believed to be allowable. Applicants respectfully request the reconsideration and withdrawal of the rejections to these claims.

CONCLUSION

Based on the foregoing amendments and remarks, Applicants respectfully request reconsideration and withdrawal of the rejection of claims and allowance of this application.

AUTHORIZATION

The Commissioner is hereby authorized to charge any additional fees which may be required for consideration of this Amendment to Deposit Account No. 13-4500, Order No. 1232-4564. A DUPLICATE OF THIS DOCUMENT IS ATTACHED.

In the event that an extension of time is required, or which may be required in addition to that requested in a petition for an extension of time, the Commissioner is requested to grant a petition for that extension of time which is required to make this response timely and is hereby authorized to charge any fee for such an extension of time or credit any overpayment for an extension of time to Deposit Account No. 13-4500, Order No. 1232-4564. A DUPLICATE OF THIS DOCUMENT IS ATTACHED.

Respectfully submitted, MORGAN & FINNEGAN, L.L.P.

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